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E-filed June 4, 2013

6 UNITED STATES BANKRUPTCY COURT
 7 DISTRICT OF NEVADA

8 In re:) Case No: BK-N-13-50194-btb

9) Chapter 12

10 PATRICK and PATRICIA)
 11 McCauley,)
 12)
 13 Debtors)
 14)
 15 /

**DECLARATION OF JOHN WHITE
 IN SUPPORT OF EX PARTE
 APPLICATION FOR ORDER
 AUTHORIZING DEBTORS TO
 EMPLOY ATTORNEYS UNDER A
 GENERAL RETAINER**

Hearing Date: N/A

I, John White, declare as follows, under pain and penalty of perjury:

1. I am the shareholder of the law firm of White Law Chartered (“WLC”). My office address is White Law Chartered, 335 West First Street, Reno, Nevada 89503. I am authorized to make this Declaration on behalf of WLC.
2. This Declaration is submitted pursuant to Fed. R. Bankr. P. 2014(a) in support of the **EX PARTE APPLICATION FOR ORDER AUTHORIZING DEBTORS TO EMPLOY ATTORNEYS UNDER A GENERAL RETAINER [WHITE LAW CHARTERED]**, filed concurrently herewith (the “Application”).
3. Based on the conflict searches conducted to date and described herein, to the best of my knowledge, neither I, WLC nor any partner or associate thereof, insofar as I have been able to ascertain, has any connection with the above-captioned debtors, their creditors or any parties-in-interest, their respective attorneys and

1 accountants, the United States Trustee or any person employed in the Office of
2 the United States Trustee, except as disclosed or otherwise described herein. Ac-
3 cordingly, WLC does not hold or represent an “interest adverse” in connection
4 with this chapter 12 case and is a “disinterested person” as defined by section
5 101(14) of the Bankruptcy Code.

6 4. WLC is familiar with the Debtors’ business, operations and the legal issues that
7 may arise in the context of this chapter 12 case and therefore is prepared to serve
8 the Debtors in that regard.

9 5. In the preparation of this Declaration, WLC has searched its databases for its con-
10 nections to various entities that are significant parties-in-interest in this chapter
11 12 case. WLC will update this Declaration as and when necessary and when WLC
12 is aware of new or additional material information. The individuals and entities
13 (“Potential Parties”) for which WLC has conducted a search include: The Debtors;
14 affiliates of the Debtors, the Debtors’ lender and other parties-in-interest, and the
15 Debtors’ largest unsecured creditors.

16 6. WLC does not have any current connections to the Potential Parties.

17 7. WLC discloses that it has represented, currently represents and/or may repre-
18 sent in the future various past, present or future ordinary course trade creditors
19 and/or service providers of the Debtors, but, except as disclosed in paragraph 6
20 above, all such representations are in connection with matters wholly unrelated
21 to the Debtors and this chapter 12 case.

22 8. WLC has not in the past represented and will not during the pendency of this case
23 represent any of the Potential Parties, or any of their affiliates or subsidiaries, in
24 matters related to this chapter 12 case. WLC will periodically review its files
25 during the pendency of this case to ensure that no conflicts or other disqualifying
26 circumstances exist or arise. If any new relevant facts or relationships are dis-

1 covered or arise, WLC will use reasonable efforts to identify such further developments
2 and promptly will file a supplement statement pursuant to Bankruptcy
3 Rule 2014(a).

4 9. None of the connections or representations described above are materially ad-
5 verse to the interests of the Debtors or the Debtors' estate.

6 10. Debtors have requested that WLC render legal services in connection with this
7 Chapter 12 case, including, without limitation, the following services:

- 8 (a) Preparation and filing of amendments to the schedules, and statement of
9 affairs;
- 10 (b) Preparation and filing of a Chapter 12 plan;
- 11 (c) Representation in the confirmation hearing or any adjourned hearings thereof;
- 12 (d) The examination and preparation of records and reports as required by the
13 Bankruptcy Code, Federal Rules of Bankruptcy Procedures and local rules of
14 court;
- 15 (e) The preparation of applications and proposed orders to be submitted in this
16 Case;
- 17 (f) The identification and prosecution of claims and causes of action on behalf of
18 the estate;
- 19 (g) The examination of proofs of claim filed herein and the possible objection
20 thereto;
- 21 (h) Advice in connection in connection with the contemplated operation of Debtors'
22 business;
- 23 (i) Assisting and advising the Debtors in connection with their duties under §
24 521 et. seq. of the Bankruptcy Code;
- 25 (j) Prepare, on behalf of the Debtors, motions, applications, answers, orders,
26 reports and papers that may be necessary or desirable in this chapter 11
27 case;
- 28 (k) Advise the Debtors in connection with any potential sale of assets;
- (l) Appear before this Court, any appellate courts, and protect the interests of
the Debtors and the value of the Debtors' estate before such courts;
- (m) Consult with the Debtors regarding tax, intellectual property, labor and em-
ployment, real estate, corporate, ligation matters, and general business op-
erational issues; and

(n) Perform all other necessary legal services and provide all other necessary legal advice to the Debtors in connection with this chapter 12 case.

Dated this 4th day of June, 2013.


John White